

Cavitch, Familo, Durkin & Frutkin

A LEGAL PROFESSIONAL ASSOCIATION

March 27, 2001

Ms. Deena Sheppard-Johnson, SR-6J
U.S. Environmental Protection Agency
Remedial Enforcement Support Section
77 West Jackson Blvd.
Chicago, Illinois 60604

RECEIVED
APR 02 2001

SUPERFUND PROGRAM
MANAGEMENT BRANCH

Re: The Chemical Recovery Systems Site
Elyria, Ohio (the "Site")

US EPA RECORDS CENTER REGION 5



464271

927435

Dear Ms. Sheppard-Johnson:

We represent Young Chemical Company. We are in receipt of the letter dated March 2, 2001. I have spoken to Mr. Thomas Nash regarding Young Chemical Company being listed as a PRP with respect to the Site. Mr. Nash was kind enough to forward to me the "Dirty Inventory" list. As you may be aware, Young Chemical Company was shown only as a supplier of calcium chloride in bags to Chemical Recovery Systems. As you can see from the enclosed letter from my client, calcium chloride is a product which my client sold. It was likely purchased for use as a raw material in a recovery process of Chemical Recovery System. Although I am not an engineer, it is my understanding that calcium chloride is not toxic and that its trace elements are not a part of the problems associated with the site.

Also enclosed is a photocopy of the Articles of Incorporation for Young Chemical Company that were filed with the Ohio Secretary of State's Office on March 2, 1959 and a print-out from the Ohio Secretary of State's Office which indicates that it is still an active corporation. As you can see, it has been in business under the same name since its inception. Also, it has not operated under any DBA's.

Also, my client has undertaken a historical review of its business and my client has never been involved with recycling or disposal of solvents.

We appreciate your efforts, however, we do not believe that Young Chemical Company is a PRP. In addition, we were unable to locate any records which are responsive to Attachment 2 of your letter.

FOURTEENTH FLOOR
THE EAST OHIO BUILDING
CLEVELAND, OHIO 44114-2876
216/621-7860 PHONE
216/621-3415 FAX
law@cfdcf.com

Edward D. Familo
Zolman Cavitch (Ret.)
*George J. Durkin**
Harvey L. Frutkin
Thomas G. Belden
Robert M. Nelson

Brian H. Richman
Michael C. Cohan
Stephen H. Gariepy
Stephen E. Pigott
Douglas A. DiPalma
Thomas M. Cawley

Kerin Lyn Kaminski
Mohammed J. Bidar
Harold O. Maxfield, Jr.
Ronald D. Holman, II
Mark A. Trubiano
Karen L. Giffen

Alexander E. Goetsch
Robert C. Heintel
Shannon L. McEanenev
Matthew E. Senra

* of Counsel

Ms. Deena Sheppard-Johnson, Sr.-6J
March 27, 2001
Page 2

If you require anything further, please feel free to give me a call.

Very truly yours,

A handwritten signature in black ink, appearing to read "Harold O. Maxfield, Jr.", with a stylized flourish at the end.

Harold O. Maxfield, Jr.

HOM:cbb

cc: Mr. John Bennett
Mr. Thomas Nash



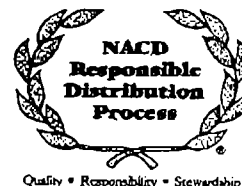
YOUNG CHEMICAL COMPANY

6465 EASTLAND ROAD • BROOK PARK, OHIO 44142

PHONE (440) 234-3200

FAX (440) 234-3255

ISO 9002 CERTIFIED



Mr. Harold O. Maxfield, Jr.
Cavitch, Familo, Durkin & Frutkin
14th Floor, The East Ohio Building
Cleveland, Ohio 44114

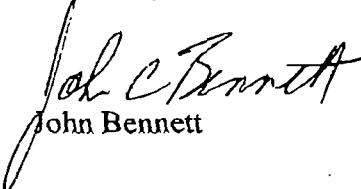
Dear Mr. Maxfield:

Thank you for your assistance regarding the PRP issue at Chemical Recovery Systems (CRS). As we discussed, Young Chemical Company was founded by Mr. Donald Young and his wife, Dorothy, in March of 1959. The Company has continued in business under its original name since its incorporation. The Company has not operated under any other name.

I searched the records of the Company, and spoke with those employees of the Company that would have knowledge of the history of the Company. To the best of my knowledge, the Company has never been involved with the recycling or disposal of solvents.

Further, the Company does sell as part of its product line, calcium chloride. Given the fact that the Company is listed as delivering bags of calcium chloride to the site, the most likely explanation is that Chemical Recovery Systems purchased the calcium chloride for use as a raw material for one of its processes. Since the purchases seem to be rather isolated, they must have had another source, or perhaps it was trying to experiment with different materials. I don't know of any specific applications where the calcium chloride would have been added to a process like a solvent still. Possible applications for calcium chloride are in the removal of water vapors from air (desiccant for tank vents) or removal of water (dehydration) directly from liquid phase hydrocarbons.

Very truly yours,


John Bennett

PADEPTCORP\YOUNG\CRS.Ltr.doc

B89 1582

RECEIPT AND CERTIFICATE

No. 6081

YOUNG CHEMICAL CO.

NAME

NUMBER

DOMESTIC CORPORATIONS

✓ ARTICLES OF INCORPORATION
 AMENDMENT
 MERGER/CONSOLIDATION
 DISSOLUTION
 AGENT
 RE-INSTATEMENT
 CERTIFICATES OF CONTINUED
 EXISTENCE
 MISCELLANEOUS

FOREIGN CORPORATIONS

LICENSE
 AMENDMENT
 SURRENDER OF LICENSE
 APPOINTMENT OF AGENT
 CHANGE OF PRINCIPAL OFFICE
 RE-INSTATEMENT
 FORM 7
 PENALTY

MISCELLANEOUS FILINGS

ANNEXATION INCORPORATION—CITY
 OR VILLAGE
 RESERVATION OF CORPORATE NAMES
 REGISTRATION OF NAME
 REGISTRATION OF NAME RENEWALS
 REGISTRATION OF NAME—CHANGE
 OF REGISTRANTS ADDRESS
 TRADE MARK
 TRADE MARK RENEWAL
 SERVICE MARK
 SERVICE MARK RENEWAL
 MARK OF OWNERSHIP
 MARK OF OWNERSHIP RENEWAL
 EQUIPMENT CONTRACT CHATTEL
 MORTGAGE
 POWER OF ATTORNEY
 SERVICE OF PROCESS
 MISCELLANEOUS
 ASSIGNMENT TRADE MARK MARK
 OF OWNERSHIP SERVICE MARK

I certify that the attached document was received and filed in the office of TED W. BROWN, Secre-
 tary of State, at Columbus, Ohio, on the 2nd day of March A D 19 59 and
 recorded on Roll 1389 at Frame 182 of the RECORDS OF INCORPORATION and MIS-
 CELLANEOUS FILINGS.

Ted W. Brown

TED W. BROWN
 Secretary of State

Filed by and Returned To: William J. Bender

FEE RECEIVED \$ 50.00

NAME: YOUNG CHEMICAL CO.

B89 1583

CORPORATION FOR PROFIT, FORM A. UNCLASSIFIED FORMS WITH FAS VALUE

THE Ohio State Seal is on the back

P 78589

Articles of Incorporation

OF

YOUNG CHEMICAL CO.

APPROVED
FOR FILING
FEB 20 1959
7-2-59
66-52

The undersigned, a majority of whom are citizens of the United States, desiring to form a corporation, for profit, under the General Corporation Act of Ohio, do hereby certify:

FIRST. The name of said corporation shall be Young Chemical Co.

SECOND. The place in Ohio where its principal office is to be located is 3112 West 63rd St.
Cleveland in Cuyahoga County.
(City, Village or Township)

THIRD. The purpose or purposes for which it is formed are: to contract and carry on a
business for the manufacture, blending, processing, compounding,
packaging and sale of, including but not limited to, chemicals,
chemical products, manufactured and related articles, to perform any
service in connection with such chemicals, chemical products, manu-
factured and related articles, to purchase, receive, lease as lessee,
take by gift, devise or bequest, or otherwise acquire, and to hold, use,
lease as lessor, encumber, sell, transfer and dispose of property, real
and personal, tangible and intangible, within or without the state;
to make contracts and incur liabilities; to acquire, hold, encumber,
transfer, guarantee and dispose of shares, bonds and other evidence
of indebtedness, securities, and contracts of other persons, associations
and corporations, domestic or foreign, and to form or acquire the
control of other corporations; to conduct business in this state and
elsewhere; to borrow money, and to issue, sell and pledge its bonds,
notes and other evidences of indebtedness, and to secure any of its
obligations by mortgage, pledge or deed of trust of all or any of its
property; and to do all things and exercise all powers incidental to
conducting its business.

FOURTH. The maximum number of shares which the corporation is authorized to have outstanding
is Five Hundred (500)
all of which shall be with a par value of One Hundred Dollars
(\$ 100.00) each.

FIFTH. The amount of capital with which the corporation will begin business is Five Hundred
Dollars (\$ 500.00).

IN WITNESS WHEREOF, We have hereunto subscribed our names, this twenty-eighth day
of February, 1959

Donald A. Young
Barney G. Young
E. D. Brader

THE STATE OF OHIO, COUNTY OF Cuyahoga

B89 1584

Personally appeared before me, the undersigned, a Notary Public, in and for said county, this 28thday of February, 19 59the above named Donald A. Young, Dorothy Youngand E. V. Bader

who each severally acknowledged the signing of the foregoing articles of incorporation to be his free act and deed, for the uses and purposes therein mentioned.

Witness my hand and official seal on the day and year last aforesaid.

(SEAL)

See G. C. 8623-3 and 8623-4

Notary Public

Page..... Line.....
Number.....

Articles of Incorporation

OF

YOUNG CHEMICAL CO.

Filed in the office of the Secretary of State, at
Columbus, Ohio, on the day
of 19
and recorded in Volume page
..... of the Records of Incorporations.

Secretary of State.

REMARKS

Articles of incorporation must be subscribed by at least three persons, a majority of whom must be citizens of the United States. They may be acknowledged before any officer who is authorized to take acknowledgments of deeds.

FORM A

THE OHIO LEGAL BLANK CO., CLEVELAND

FORM NO. AA

THE OHIO LEGAL BLANK CO., CLEVELAND

B89 1585

Original Appointment of Agent
Ohio Corporation
Section 8623-129, General Code

KNOW ALL MEN BY THESE PRESENTS, That Donald A. Young
(Name of Agent)
of Cuyahoga County, Ohio,
(City or Town)
a natural person, and resident of said County, being the County in which the principal office of
Young Chemical Co. is located, is hereby appointed as the person on whom process, tax
(Name of Corporation)
notices and demands against said Young Chemical Co. may be served.
(Name of Corporation)
Young Chemical Co.
(Name of Corporation)

Donald A. Young
Harry G. Young
E. V. Bunker
(Incorporators)

(To be executed by all or a majority of the
incorporators at the time of organization.)

Cleveland, Ohio

February 28, A. D. 19 59

Young Chemical Co.

3112 West 63rd St.

Cleveland, Ohio

Gentlemen: I hereby accept the appointment as the representative of your company upon whom
process, tax notices, or demands may be served.

Donald A. Young

State of Ohio,

County of Cuyahoga SS:

Personally appeared before me, the undersigned, a Notary Public in and for said County, this 28th
day of February, A. D. 19 59, the above named Donald A. Young
who acknowledged the signing of the foregoing to be his free act and deed for the uses and purposes therein
mentioned.

WITNESS my hand and official seal on the day and year last aforesaid:

Notary Public in and for

Cuyahoga

County, Ohio.

**Business Information**

Business Name	Charter / Registration Number	Type	Original Filing Date	Status	Expiration Date	Location / County / State	Agent / Contact Info	Business Filing Info View Images !	Prior Business Name Info
YOUNG CHEMICAL CO.	278589	Corporation For Profit	Mar 02 1959	Active		Cleveland Cuyahoga Ohio	Click for Details	Click for Details	Click for Details

Row(s) 1 - 1

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**Agent/Contact Information**

Agent Name	Agent Address	City	State	Zip	Agent Effective Date	Agent Status
Todd Kroehle	6465 Eastland Road	Brookpark	Ohio	44142	Sep 18 1998	Active

Row(s) 1 - 1

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Business Filing Information

Business Name	Filing Type	Filing Date	Doc Id <i>Click for Image !</i>	Additional Filing Type Info
YOUNG CHEMICAL CO.	Domestic Articles/For Profit	Mar 02 1959	B089_1583	
	Domestic Agent Address Change	Jan 27 1986	F823_1541	
	Domestic Continued Existence Letter	Sep 09 1993	000000099631	
	Domestic Continued Existence	Oct 13 1993	000000099632	
	Agent Name/Address Tax Update	Jan 08 1999	Agntupdt	
	Agent Name/Address Tax Update	Feb 01 1999	Agntupdt	
	Agent Name/Address Tax Update	Apr 07 1999	Agntupdt	

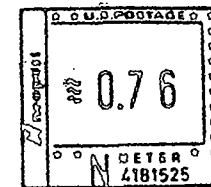
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